

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION,

MDL NO. 2875

HON. ROBERT B. KUGLER

THIS DOCUMENT RELATES TO:

*Neal v. Zhejiang Huahai Pharmaceutical
Co., Ltd., et al.,*

Case No. 1:18-cv-16071-RBK-JS

**NOTICE OF VIDEOTAPED DEPOSITION OF
PLAINTIFF TALSIE NEAL**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order No. 20, Dkt. 632), Defendants Solco Healthcare U.S., LLC, Huahai U.S., Inc., and Princeton Pharmaceutical Inc. will take the deposition upon oral examination of Talsie Neal on January 29, 2021 at 9:00 a.m CST at 1250 Millerville Road, Apartment 12204, Baton Rouge, Louisiana. Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The attorney contact for the deposition is:

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Date: December 23, 2020

Respectfully submitted,

s/ Drew T. Dorner

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U.S., LLC, and Huahai U.S., Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of December, 2020 a true and correct copy of the Notice of Videotaped Deposition of Plaintiff Talsie Neal was served upon the following by e-mail, with copies to the following Counsel for Plaintiffs:

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